

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

General John T. Chain, Jr. (USAF, Retired),)	
)	
Plaintiff,)	
)	
vs.)	Case No. 07 C 6317
)	
Lake Forest Partners, LLC, Christopher T.)	Judge Guzman
French, Albert J. Montano, and Mark D.)	
Weissman, M.D.,)	Magistrate Judge Mason
)	
Defendants.)	
)	

MOTION FOR EXTENSION OF TIME
WITHIN WHICH TO FILE A RESPONSIVE PLEADING

Defendants Lake Forest Partners, LLC (“Lake Forest”) and Christopher T. French, by and through their attorneys, respectfully move this Court for an extension of time to file their responsive pleading. In support of their motion, Defendants Lake Forest Partners, LLC and Christopher T. French state as follows:

1. Defendants Lake Forest and French initially retained John M. Riccione, Paul A. Greenberg, and Jillian S. Cole of Aronberg Goldgehn Davis & Garmisa to represent them in this matter. John M. Riccione, Paul A. Greenberg, and Jillian S. Cole filed appearances on behalf of Defendants Lake Forest Partners, LLC and Christopher T. French.

2. Defendants Lake Forest and French, pursuant to a motion filed on December 13, 2007, and through their attorneys at Aronberg Goldgehn Davis & Garmisa, obtained an extension of time allowing them to file their responsive pleading by January 28, 2008.

3. Since that time Defendants Lake Forest and French have decided to retain other counsel to represent them in this matter.

4. Attorneys Riccione, Greenberg, and Cole have desired to file a motion to withdraw as counsel for Defendants Lake Forest and French, but have delayed doing so to allow Defendants Lake Forest and French time to secure additional counsel.

5. Additionally, because Defendants Lake Forest and French no longer desired to have attorneys Riccione, Greenberg, and Cole represent them in this matter, the attorneys did not prepare a responsive pleading to be filed by January 28, 2008.

6. Defendants Lake Forest and French have been in the process of retaining new counsel to represent them in this matter, but no arrangements were able to be finalized prior to the January 28, 2008 time within which to file a responsive pleading. As such, Defendants Lake Forest and French were unable to file a motion for substitution of counsel, and were unable to have a responsive pleading prepared to be filed by January 28, 2008.

7. As Defendants Lake Forest and French are still in the process of retaining new counsel to represent them in this matter, Defendants request an additional thirty (30) days within which to file a responsive pleading.

8. The requested extension is appropriate under the circumstances, reasonable, fair, and will not unfairly prejudice Plaintiff John T. Chain, Jr..

WHEREFORE, Defendants Lake Forest Partners, LLC and Christopher T. French, respectfully request that this Court enter an order granting Defendants an extension of thirty (30) days within which to file a responsive pleading.

Dated: January 28, 2008

Respectfully submitted,

Defendants Lake Forest Partners, LLC, and
Christopher T. French

s/ John M. Riccione

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